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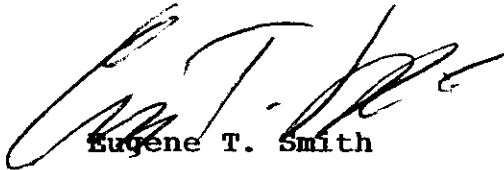
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Petition for Rule Making,
FM Broadcast Allotments

On behalf of Creative Media, Incorporated, licensee of Station KASR, Conway, Arkansas, and in accordance with Section 73.202 (b) of the Commission's Rules, there are transmitted herewith for filing an original and four copies of a Petition For Rule Making seeking to change the allotment for Station KASR.

If additional information is needed, please contact the undersigned.

Very truly yours,



Eugene T. Smith
Counsel for Creative Media, Incorporated

ETS:ch

Attachments

cc: Mr. Michael Harrison (w/att.)

540-729-1927

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02-141



WHEELER BROADCAST CONSULTING

Engineering Report

Creative Media Incorporated
Petition For Rule Making - Amendment to 47 CFR 73.202(b)
Channel 224 C3 - Vilonia, Arkansas

This consultant has been retained by Creative Media Incorporated (Creative), Licensee of KASR in Conway, Arkansas for the purpose of preparing the technical portion of a petition for Rule Making which seeks an amendment to 47 CFR 73.202(b) of the Commission's Rules. Specifically, Creative seeks an upgrade from Class A to Class C3 for KASR as well as a change in the KASR City of License from Conway, AR to Vilonia, AR.

Proposed Re-Allocation

The United States Census Bureau lists the City of Vilonia, Arkansas with the coordinates of:

35° 05' 02" N
92° 12' 40" W

Channel 224 C3 is fully compliant with the minimum distance provisions of 47 CFR 73.207, mutually exclusive with the KASR License, at the reference coordinates of:

35° 03' 04" N
92° 04' 29" W

3718 W. 52nd TERRACE
SHAWNEE MISSION, KS.
66205 913.831.1622
816.968.4252

A full search of the Commission's April 23, 2002 is included in this report as Exhibit 1 which demonstrates compliance with the Commission's spacing requirements. The proposed allocation site is 12.96 km distant from the City of Vilonia at a bearing of 106.3°, well within the 23.2 km predicted distance to the 70 dBu contour of a standard (25 kW at 100m HAAT) Class C3 radio station. The entire community of Vilonia would in fact receive a predicted signal well in excess of 70 dBu as required by 47 CFR 73.315. Exhibit 2 of this report is a digitally generated map which shows the predicted 60 dBu and 70 dBu contours, based on actual terrain, that would be provided by the proposed Channel 224 C3 Vilonia operation.

Vilonia, Arkansas

Vilonia is an incorporated community with a population of 2,106 Persons according to the 2000 United States Census. Vilonia has its own Post Office and its own Zip Code (72173). The population of Vilonia has increased dramatically over the last decade as it has seen an increase in population from 1133 Persons (1990) to 2106 Persons (2000).. The increase in population of 973 Persons represents an increase of 85.9%. Vilonia has a mayor and city council form of local government. The elected mayor is currently Allen Lee. Vilonia provides numerous services for its citizens such as police protection through a municipal police force and fire protection through the Hill Top Volunteer Fire Department. The police force has 6 full-time officers and the fire department has 25 firefighters. Vilonia provides municipal water and sewer services through the Vilonia Water Works Department and the Vilonia Sewer District respectively. Economic Development is fostered through the Vilonia Area Chamber of Commerce. The City maintains a municipal site on the internet at www.vilonia.com. Educational needs for the citizens of Vilonia are provided by the Vilonia School District which operates Vilonia Elementary School, Vilonia Middle School, Vilonia Junior High School, and Vilonia High School. Further educational opportunities are available through the Vilonia Public Library. Vilonia further has a local internet service provider, CMT II. The spiritual needs of the citizens of Vilonia are provided 12 churches which cover all major denominations. Health care for the citizens of Vilonia and the surrounding areas is provided by the Himmler Medical Clinic and St. Vincent Hospital and their staffs. Vilonia has numerous businesses including 5 car dealers, 3 auto repair garages, an auto body shop, 4 grocery stores, 6 restaurants, a local hardware store, and 5 construction contractors covering the building trades. Financial services are provided by three local banks, Insurance services are provided by 5 local agents, and real estate services are provided by a local Realtor, Bill Jones Real Estate.

Vilonia, Arkansas is a thriving community which meets all of the Commission's requirements for recognition as an independent community that is eligible for its first local service.

Little Rock, Arkansas Urbanized Area.

Vilonia, Arkansas is not located within the Little Rock Urbanized Area as defined by the 1990 US Census¹. The 70 dBu contour of the proposed KASR Vilonia operation covers well under 50% of the Little Rock Urbanized area. The reference coordinates for the proposed Vilonia operation are 15.0 km distant from the nearest point of the Little Rock Urbanized area so a portion of that urbanized area is indeed covered with a 70 dBu signal. Exhibit 5 of this report is a Marplot map with the predicted 70 dBu contour of the proposed Vilonia operation and the boundaries of the Little Rock Urbanized area. From that map it was determined that only 10.15% of the Urbanized area would receive 70 dBu service from the proposed operation.

Comparative Service

KASR on Channel 224 A at Conway, Arkansas operates with an effective radiated power of 3.4 kW at 86 m above average terrain so as to equal 3 kW at 100 meters HAAT². KASR provides 60 dBu service to an area encompassing 1540.2 km² which contains a population of 81,806 persons according to the 2000 US Census. The proposed Channel 224 C3 operation at Vilonia would provide 60 dBu service to an area encompassing 4,641.9 km² which contains a total population of 278,396 persons according to the same census. The total area increase would thus be 301% and the increase in population would equal 340.3%.

Gain and Loss Area

The proposed Channel 224 C3 at Vilonia would result in a large service gain area and a smaller service loss area. A large portion of Faulkner County Arkansas would not see a loss nor a gain in service. The gain and loss areas are graphically depicted on a digitally generated map which is included in this report as Exhibit 3. The total area encompassed by the gain area is 3,991 km² which contains a population of 219,883 Persons while the total area contained in the loss area equals 727.6 km² which contains a population of 30,395 Persons.

¹ The Urbanized area definitions based on the year 2000 Census have not yet been released by the US Census Bureau.

² Channel 224 A at Conway was allocated under the Commission's previous, 3 kW, Class A rules and cannot upgrade to 6 kW at its present tower site due to a grandfathered short-spacing with KLYR-FM in Clarksville, AR.

Gain and Loss Area (continued)

The loss area continues to be well served by aural services. Exhibit 4 of this report shows the 60 dBu service contours of an additional 20³ radio stations that serve all or part of the loss area.

Conway, Arkansas

The proposed re-allocation of Channel 224 from Conway, Arkansas to Vilonia, Arkansas would not remove the sole local service from Conway. In addition to KASR there are 5 other radio stations that are presently licensed to Conway. Specifically, KCON AM, KTOD AM, KUCA (FM), KHDJ (FM)⁴ and KMJX (FM) would all continue to be local services in Conway.

Allocation Considerations

The Commission's allocation priorities⁵ are as follows:

- 1) First Fulltime Aural Service.
- 2) Second Fulltime Aural Service.
- 3) First Local Service.
- 4) Other Public Interest Matters.

Both Conway and Vilonia receive in excess of ten aural services and, as such, priorities one and two are not applicable in either case. The proposed change in city of license from Conway, Arkansas to Vilonia, Arkansas is, however, a preferable allocation as it triggers priority three of the allocation priorities since it provides a First Local Service to Vilonia while not removing the sole local service from Conway.

³ The 20 FM radio station contours shown in Exhibit 4 do not reflect the entire number of additional aural services in the loss area. In order to aid in the clarity of the exhibit only a sufficient number do demonstrate, beyond doubt, that the loss area remains well served were included.

⁴ KHDJ is a Class D non commercial educational operation.

⁵ See 90 FCC 2d 88, 91 (1982)

Conclusion

Vilonia, Arkansas is an independent, incorporated, community that is deserving of its first local aural service. The proposed substitution of Channel 224 A from Conway for Channel 224 C3 at Vilonia will provide that service and, as shown above, is in the public interest. Accordingly, it is respectfully requested that 47 CFR 73.202(b), the Commission's Table of Allotments, be amended to read as follows:

Community	Present	Proposed
Conway, AR ⁶	224 A, 286 C1	286 C1
Vilonia, AR	-----	224 C3

Methodology

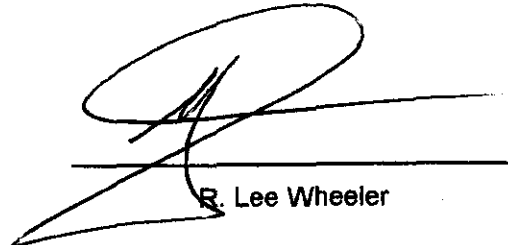
All information for FM facilities was gleaned from the April 23, 2002 release of the Commission's CDBS database. All height above average terrain calculations were based on 8 cardinal radials as set forth in 47 CFR 73.313 and terrain data was extracted by a linear interpolation of the NGDC 30 second terrain database. Predicted service contours were based on 360 evenly spaced radials and population determinations were made by overlaying the contours on Minor Civil Subdivision maps which were created via Marplot with geographic data supplied by the United States Census Bureau. Population was determined by summing the population contained within those subdivisions. When only a portion of a subdivision was encompassed the area within that subdivision was measured with a K&E model 620000 Polar Planimeter and uniform population density was assumed. All census data was gathered from either the United States Census Bureau or the Arkansas Census State Data Center via its internet site at www.aiea.uarl.edu/csdc/default.html. County by County subdivision population details for the gain area and loss area are included in this report as Exhibits 6 to 9.

⁶ Channel 217 A and 226 D are not included in 47 CFR 73.202(b).

Certification

All information contained in this report is true and accurate to the best of my belief. Having had numerous matters before the Commission, my qualifications are a matter of record.

05/14/02
Date


R. Lee Wheeler

Wheeler Broadcast Consulting
3718 W. 52nd Terrace Shawnee Mission, KS 66205
Creative Media Incorporated
Vilonia, Arkansas

Exhibit 1

REFERENCE

35 03 04 N
92 04 29 W

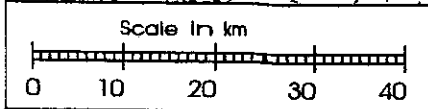
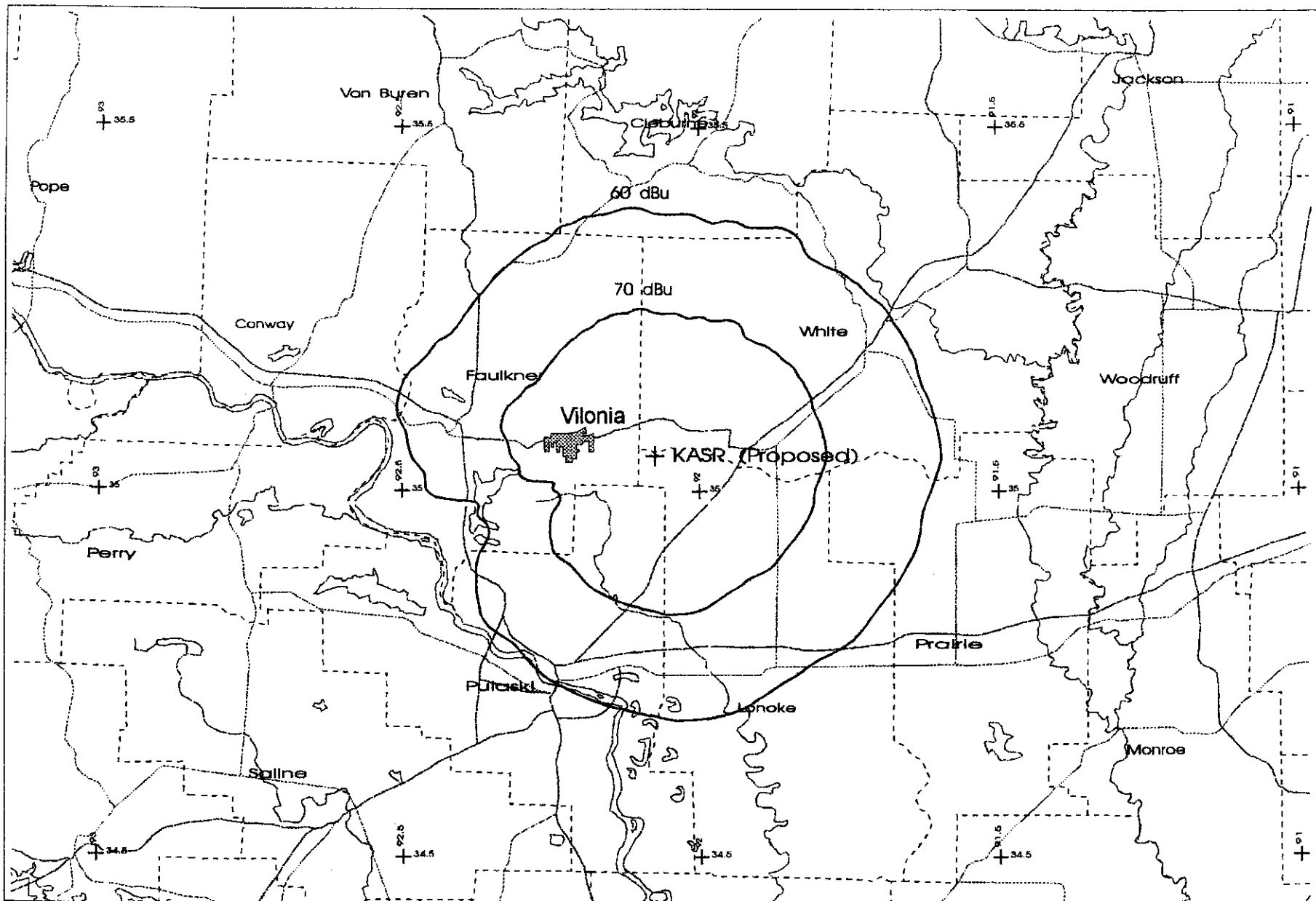
CLASS = C3
Current Spacings

DISPLAY DATES

DATA 04-23-02
SEARCH 05-02-02

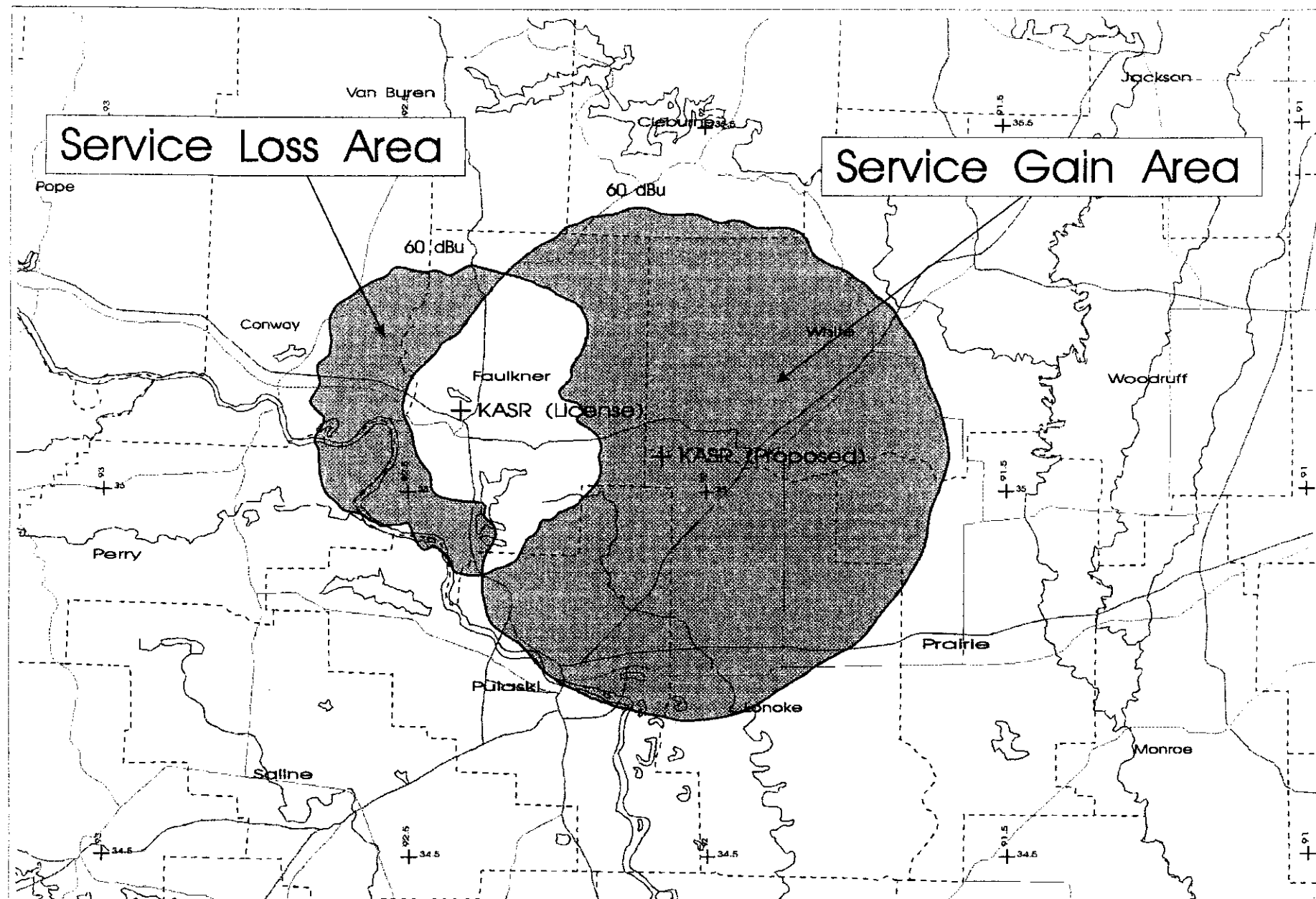
----- Channel 224 - 92.7 MHz -----

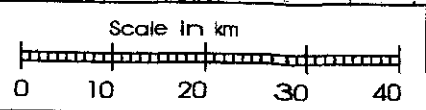
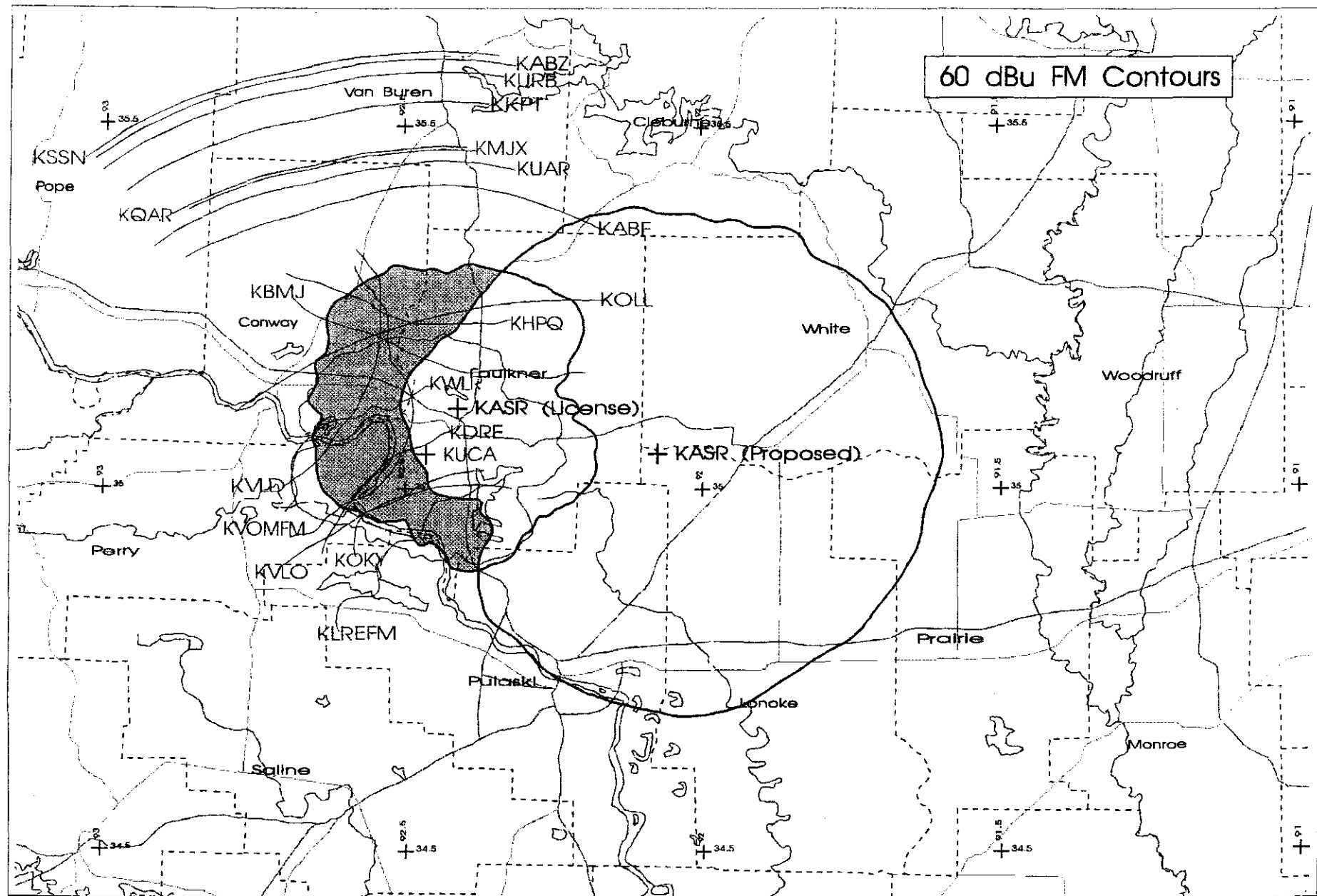
Call	Channel	Location	Dist	Azi	FCC	Margin
N. Lat.	W. Lng.	Power	HAAT			
KASR	LIC 224A	Conway	AR	31.48	282.7	142.0 -110.52
35 06 46	92 24 42	CN	3.400 kW	86 M		
		Creative Media Incorporate	BMLH19900111KF			
KLYRFM	LIC 224A	Clarksville	AR	142.01	290.7	142.0 0.01
35 29 38	93 32 21	CN	3.000 kW	89 M		
		Forrester Et Al	BLH19840305AB			
KIPR	LIC 222C1	Pine Bluff	AR	76.05	186.5	76.0 0.05
34 22 12	92 10 07	CN	100.000 kW	286 M		
		Citadel Broadcasting Compa	BLH19860501KF			
KZLE	LIC 226C	Batesville	AR	98.47	18.6	96.0 2.47
35 53 29	91 43 32	CN	100.000 kW	300 M		
		Wrd Entertainment, Inc.	BLH19970905KB			
		From Channel 226C1 per one-step process (mod of BPH-941021IC)				
KVRE.C CP	225C3	Hot Springs Village	AR	101.58	243.7	99.0 2.58
34 38 34	93 04 08	ZCX	25.000 kW	100 M		
		Caddo Broadcasting Company	BMPH20011002ABX			
KCDI.A APP	227C3	Bryant	AR	46.68	232.0	43.0 3.68
34 47 31	92 28 38	ZCX	5.600 kW	213 M		
		Malvern Entertainment Corp	BPH20020419AAF			
KWYNFM	LIC 223C2	Wynne	AR	124.30	82.0	117.0 7.30
35 11 59	90 43 23	CN	35.000 kW	102 M		
		East Arkansas Broadcasters	BLH19960709KD			
KVRE	LIC 225A	Hot Springs Village	AR	100.44	243.9	89.0 11.44
34 38 59	93 03 33	CN	6.000 kW	100 M		
		Caddo Broadcasting Company	BMLH19950615KA			
		To Channel 225C3 per one-step application 981214IA				
RADD	ADD 224A	Bearden	AR	155.44	198.7	142.0 13.44
33 43 24	92 36 54		6.000 kW	100 M		
ALLO	VAC 227C3	Bryant	AR	57.76	217.3	43.0 14.76
34 38 13	92 27 27		25.000 kW	100 M		
KZLE.A APP	226C1	Batesville	AR	98.47	18.6	76.0 22.47
35 53 29	91 43 32	CX	99.000 kW	300 M		
		Wrd Entertainment, Inc.	BPH20020419ABB			
ALLO	VAC 226C1	Batesville	AR	98.47	18.6	76.0 22.47
35 53 29	91 43 32		100.000 kW	299 M		
KHPQ	LIC 221C3	Clinton	AR	74.45	332.2	43.0 31.45
35 38 37	92 27 33	ZCN	10.000 kW	156 M		
		King-sullivan Radio	BLH19940712KZ			
KCDI	LIC 227A	Bryant	AR	74.18	215.6	42.0 32.18
34 30 27	92 32 48	C	6.000 kW	100 M		
		Malvern Entertainment Corp	BLH20000626AAA			



Creative Media Incorporated - Channel 224 C3 Vilonia, AR
N. Lat. 35 03 04 W. Long. 92 04 29

EXHIBIT 2
LEE WHEELER - 05/02



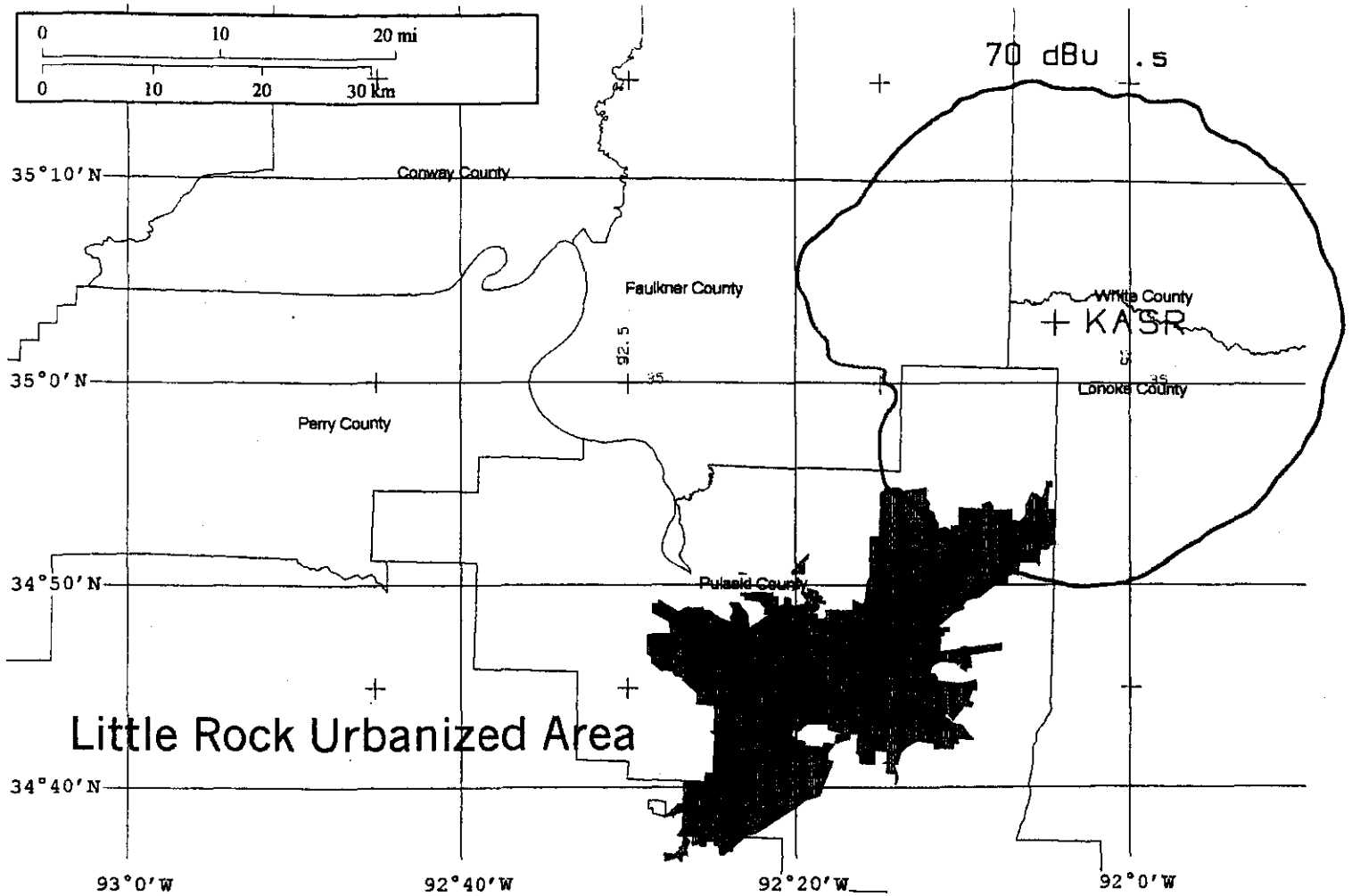


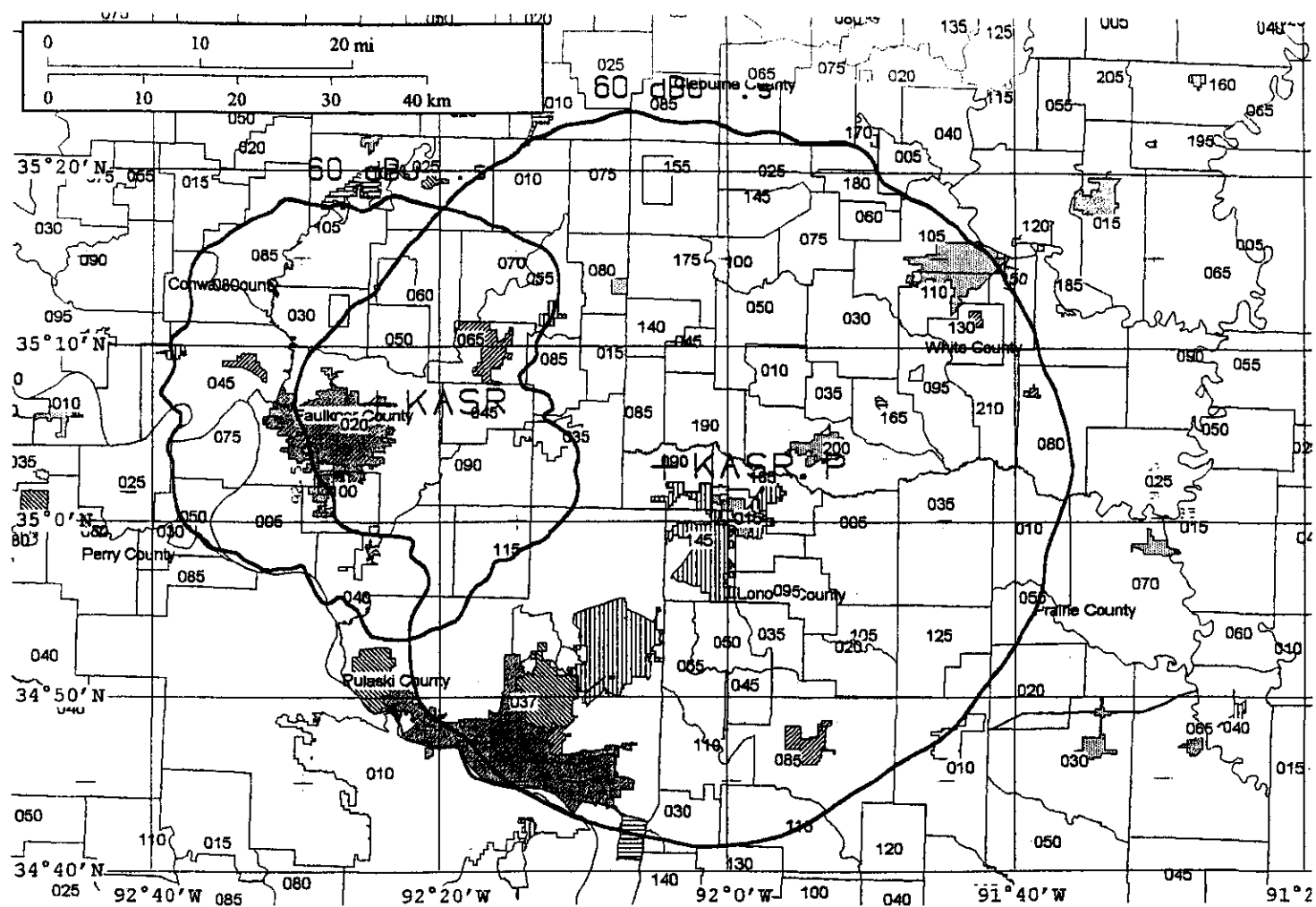
Additional Aural Services in Loss Area

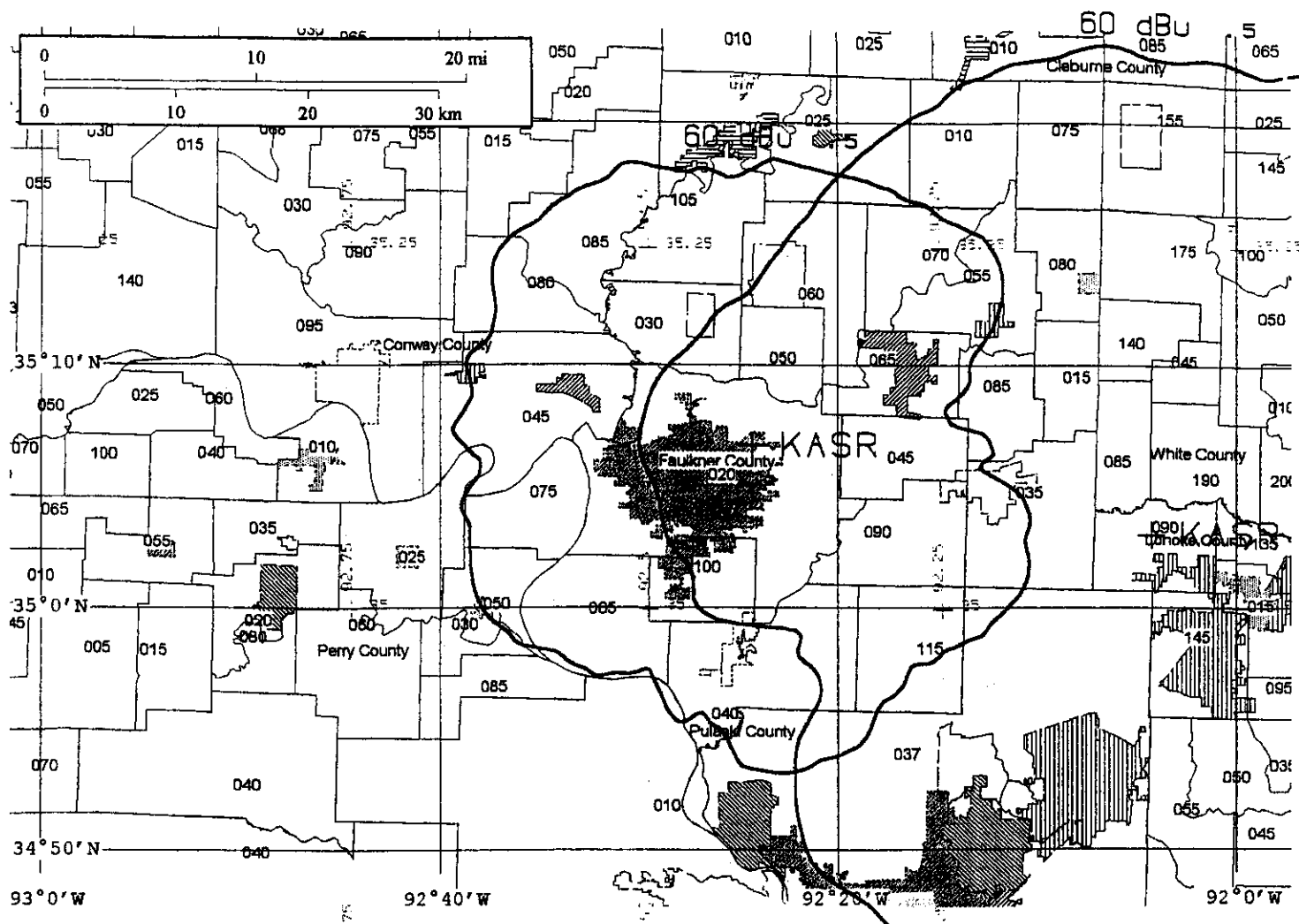
N. Lat. 35 03 04 W. Lng. 92 04 29

EXHIBIT 4

LEE WHEELER - 05/02







Loss Area Population Determination

County	Subdivision	Population	Percentage Loss	Loss Population
Conway	Howard (rem)	831 Persons	82.3 %	684 Persons
Conway	Meniffee City	311 Persons	100 %	311 Persons
Conway	Plumerville City	854 Persons	59.8v %	511 Persons
Conway	Steele	575 Persons	62.2 %	358 Persons
Conway	Union	867 Persons	66.7 %	578 Persons
Faulkner	Benedict	1,057 Persons	97.0 %	1,025 Persons
Faulkner	California	1,467 Persons	3.8 %	56 Persons
Faulkner	Cadron (rem)	8,085 Persons	15.63 %	1,263 Persons
Faulkner	Conway City	43,167 Persons	34.0 %	14,677 Persons
Faulkner	Clifton (rem)	1,547 Persons	61.2 %	947 Persons
Faulkner	Wooster City	516 Persons	91.0 %	469 Persons
Faulkner	Danley (rem)	1,856 Persons	57.8 %	1,073 Persons
Faulkner	Mayflower City	1,631 Persons	100 %	1,631 Persons
Faulkner	Hardin (rem)	1,645 Persons	22.8 %	375 Persons
Faulkner	Greenbriar City	3,042 Persons	26.0 %	791 Persons
Faulkner	Pine Mountain	3,354 Persons	50.5 %	1,694 Persons
Faulkner	Union	1,518 Persons	96.4 %	1,463 Persons
Faulkner	Walker (rem)	618 Persons	24.4 %	151 Persons
Perry	Houston (rem)	159 Persons	3.8 %	6 Persons
Perry	Kenney	127 Persons	2.0 %	3 Persons
Perry	Perry (rem)	813 Persons	53.3 %	433 Persons
Perry	Union	851 Persons	97.9 %	833 Persons
Pulaski	Big Rock (rem)	17,865 Persons	1.2%	214 Persons
Pulaski	Hill (rem)	21,769 Persons	3.9 %	849 Persons
Total				30,395 Persons

Gain Area Population Determinaton**Cleburne County**

Subdivision	Total Population (Persons)	Subdivision Gain %	Gain Population (Persons)
Cadron twp (rem)	770	28.6 %	220
Mountain twp	637	13.8 %	88
Pickens twp	546	3.0 %	16
Piney twp	1,225	26.6 %	326
Total Cleburne County			650

Faulkner County

Subdivision	Total Population (Persons)	Subdivision Gain %	Gain Population (Persons)
Benton twp	774	84.0 %	650
Bristol twp	165	100 %	165
California twp (rem)	1,265	30.0 %	380
Cypress twp (rem)	1,713	66.6 %	1,140
Vilonia town	2,106	7.8 %	164
Enola twp (rem)	568	45.0 %	256
Enola town	188	20.0 %	38
Matthews twp	489	11.8 %	58
Mountain twp	339	100 %	339
Mount Vernon twp	400	100 %	400
Newton twp	602	70.0 %	421
Wilson twp	1,035	25.0 %	259
Total Faulkner County			4,270

Lonoke County

Subdivision	Total Population (Persons)	Subdivision Gain %	Gain Population (Persons)
Butler twp	2,057	100 %	2,057
Carlisle twp (rem)	458	33.3%	152
Carlisle City	2,304	4.5 %	104
Caroline twp	3,009	100 %	3,009
Cleveland twp	250	100 %	250
Dortch twp	100	82.4 %	82
Eagle twp	935	100 %	935
Furlow twp	912	100 %	912
Goodrum twp	2,239	100 %	2,239
Gray twp	3,335	100 %	3,335
Lonoke twp (rem)	900	76.4%	688
Lonoke City	4,287	100 %	4,287
Magness twp	2,056	100 %	2,056
Oak Grove twp	3,514	100 %	3,514
Prairie twp	380	100 %	380
Pulaski twp	416	100 %	416
Richwoods twp	228	63.3%	144
Totten twp	341	100 %	341
Ward twp	3,161	100 %	3,161
York twp	16,200	100 %	16,200
Total Lonoke County			44,262

Prairie County

Subdivision	Total Population (Persons)	Subdivision Gain %	Gain Population (Persons)
Bullard twp	182	58.8 %	107
Center twp	474	8.3 %	39
Hickory Plain twp	576	100 %	576
Union twp	87	60.0 %	52
Total Prairie County			774

Pulaski County

Subdivision	Total Population (Persons)	Subdivision Gain %	Gain Population (Persons)
Gibson CDP	4,678	100 %	4,678
Gravel Ridge CDP	3,232	100 %	3,232
Jacksonville City	29,916	100 %	29,916
Little Rock City	183,133	1.5 %	2,747
McAlmont CDP	1,922	100 %	1,922
North Little Rock City	60,433	75.6 %	45,687
Scott CDP	94	40.0 %	38
Sherwood City	21,511	100 %	21,511
Hill twp (rem)	21,769	75.5 %	16,436
Total Pulaski County			126,167

White County

Subdivision	Total Population (Persons)	Subdivision Gain %	Gain Population (Persons)
Albion twp	295	55.6 %	164
Antioch twp	487	100 %	487
Cadron twp	383	100 %	383
Cane twp	1,262	100 %	1,262
Chrisp twp	803	100 %	803
Cleveland twp	90	100 %	90
Coffey twp	922	100 %	922
Crosby twp	513	100 %	513
Des Arc twp	831	100 %	831
Dogwood twp (rem)	307	33.3 %	102
Griffithville City	237	100 %	237
El Paso twp	718	100 %	718
Garner twp	539	100 %	539
Gravel Hill twp	308	100 %	308
Gray twp (rem)	2,028	71.4 %	1,448
Searcy City	18,928	91.0 %	17,224
Gum Springs twp	3,363	100 %	3,363
Higginson twp	1,029	100 %	1,029
Jefferson twp	374	100 %	374
Joy twp	465	100 %	465
Kensett twp	2,272	55.6 %	1,263
Kentucky twp	1,114	100 %	1,114
McRae twp	1,266	100 %	1,266
Marion twp	378	45.4 %	172
Marshall twp	868	100 %	868
Mount Pisgah twp	101	100 %	101
Red River twp	509	5.5 %	28
Royal twp	666	100 %	666
Union twp	6,813	100 %	6,813
Walker twp	207	100 %	207
Total White County			43,760

Total Population in Gain Area

219,883 Persons